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Attorney for all Plaintiffs
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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
GREAT FALLS DIVISION**

NORTHERN PLAINS RESOURCE
COUNCIL, et al.,

Plaintiffs,

v.

U.S. ARMY CORPS OF ENGINEERS,
et al.,

Defendants,

TC ENERGY CORPORATION, et al.,

Intervenor-Defendants,

STATE OF MONTANA,

Intervenor-Defendant,

AMERICAN GAS ASSOCIATION,
et al.,

Intervenor-Defendants.

CV 19-44-GF-BMM

**Plaintiffs' Unopposed Motion to
File a Combined Response to
Federal Defendants' Motion for
Partial Stay Pending Appeal and
TC Energy's Motion for Stay
Pending Appeal**

Plaintiffs hereby file this unopposed motion for leave to file a single combined brief of up to 10,000 words in opposition to Defendants' motions for a stay pending appeal and supporting memorandums.

On April 27, Federal Defendants filed a Motion for Partial Stay Pending Appeal. ECF No. 131. On April 29, the State of Montana and the NWP 12 Coalition each filed a brief in support of Federal Defendants' motion. ECF Nos. 135, 138. Also on April 29, TC Energy filed its own Motion for Stay Pending Appeal. ECF Nos. 136-37. Pursuant to the Court's Order of April 28, ECF No. 134, Plaintiffs' response is due on May 6.

Plaintiffs respectfully seek leave to file a single combined memorandum in opposition to these four pleadings, not to exceed 10,000 words.

Plaintiffs have conferred with opposing counsel, and no party opposes this motion.

Dated: May 1, 2020

Respectfully submitted,

/s/ Doug Hayes

Doug Hayes (*pro hac vice*)

/s/ Eric Huber

Eric Huber (*pro hac vice*)

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CERTIFICATE OF SERVICE

I certify that I served the foregoing motion on all counsel of record via the Court's CM/ECF system.

/s/ Cecilia D. Segal